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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Samiur Rahman Arif,

Plaintiff

v.

Daniel Lawton, Antony Blinken,

Defendants

Case No. 2:24-cv-01472-CDS-BNW

Stipulation to Stay the Proceedings
(Second Request)

Under Local Rule IA 6-1 and Local Rule 7-1, Plaintiff and Federal Defendants, through their undersigned counsel, hereby stipulate and jointly request that the Court stay all deadlines in this matter and hold this case in abeyance for an additional period of 60 days until **January 31, 2025**.

The parties have conferred, and they still believe they may be able to resolve this matter without continued litigation. The subject of this litigation concerns Plaintiff's wife's I-130 visa application. Federal Defendants are in the process of procuring physical files to assess the application and need additional materials from Plaintiff or his wife to adjudicate the I-130 application, which Plaintiff knows and is working on providing. The additional time is needed so that Plaintiff can provide the requested information. Pending the remaining administrative processing of the I-130 application, this litigation may become moot.

This is the second request to stay the proceedings. This request is not sought for purposes of delay or any other improper purpose, but to facilitate the parties' efforts to

resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ. 1 2 P. 1. The parties reserve the ability to seek additional time to finalize resolution, if 3 necessary. 4 Respectfully submitted this 21st day of November 2024. 5 GOLDSTEIN IMMIGRATION LAWYERS JASON M. FRIERSON 6 United States Attorney <u>/s/ Joshua Goldstein</u> JOSHUA GOLDSTEIN 7 <u>/s/ Virginia T. Tomova</u> VIRGINIA T. TOMOVA 611 Wilshire Blvd., Ste. 317 8 Los Angeles, CA 90017 **Assistant United States Attorney** (213) 425-1979 Attorneys for the Federal Defendants 9 ig@jgoldlaw.com 10 SANDY VAN VAN LAW FIRM 11 1290 S. Jones Blvd., Ste. 250 Las Vegas, NV 89146 12 (833) 707-1234 <u>sandy@vanlawfirm.com</u> 13 Attorneys for Plaintiff 14 15 16 IT IS SO ORDERED: 17 18 19 United States District Judge 20 21 DATED: November 22, 2024 22 23 24 25 26 27

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